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**FILED**  
DISTRICT COURT OF GUAM  
**SEP 06 2002**

MARY L. M. MORAN  
CLERK OF COURT

IN THE U.S. DISTRICT COURT  
OF GUAM

GLENN A. LANGDALE-HUNT

CIVIL CASE NO. 02-00017

Plaintiff,

vs.

~~PROPOSED~~ DISCOVERY  
PLAN

UNITED STATES OF AMERICA,

Defendant.

\_\_\_\_\_ /

**PROPOSED DISCOVERY PLAN**

Pursuant to Rule 26 (f) of the Federal Rules of Civil Procedure and Local Rules 16.2, the parties agree to and hereby submit the following plan:

A. Depositions of fact witnesses may begin at once and be taken as needed, prior to the discovery cutoff date. Some of the parties may call expert witnesses in this case.

B. Unless additional discovery is ordered by the Court, the parties also may propound one set each of interrogatories (25 maximum) and requests for admissions (25 maximum). Requests for production may also be propounded. This discovery shall be served in such a fashion as to be subject to answer or response on or before the discovery cutoff date.

**ORIGINAL**

**August 27, 2002**

C. The parties, except as otherwise noted, agree to provide all prediscovery and preliminary discovery mandated by local rules and FRCP Rule 26 by December 2, 2002. Compliance with mandatory disclosure as is set forth in Rule 26 (a) (1) is on-going.

D. All parties will exchange names and reports (if any) of expert witnesses on or before December 27, 2002.

E. The specific subjects on which discovery may be needed are:

Facts supporting the nature of the claims and defenses.

F. Other than the provisos set forth above in Item B, the parties do not anticipate requiring any other changes or limitations on discovery as imposed under the federal and local rules.

G. The Cutoff date for discovery is February 3, 2003.

**APPROVED AS TO FORM AND CONTENT:**

Dated: August 27, 2002.

FREDERICK A. BLACK  
United States Attorney  
Districts of Guam and NMI

BY:

  
EDWARD J. LYNCH, ESQ.  
Attorneys for Defendant

Dated: August 27, 2002.

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